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**Paul A. Sanders**  
*Partner*

April 22, 2025

**VIA CM/ECF**

Hon. Kenneth M. Karas  
U.S. District Court Judge  
Southern District of New York  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: Michelle Freudenberg, as Administratrix of the Estate of Eric Freudenberg v.  
County of Orange, et al.  
SDNY Civil No.: 7:23-cv-00847-KMK  
Our File No.: 3116957

Dear Judge Karas:


On behalf of defendants Wellpath, LLC, Wellpath NY, LLC, Salwa Khouri, M.D. and Mandi Zaccagnino, N.P., please be advised that the parties to this litigation have entered into a tentatively settlement, subject to Surrogates Court approval.

Plaintiff's counsel is in the process of preparing an application to obtain Surrogates Court approval and anticipates filing the same in the near term.

This case is currently stayed due to a pending bankruptcy; consequently, there is no need to hold deadlines in abeyance. We propose that the Court set a control date 60 or 90 days out for the parties to update the Court on the status of settlement finalization and Surrogates Court approval.

Thank you for Your Honor's consideration of this submission.

Respectfully submitted,



Paul A. Sanders

PAS:np

cc: ALL VIA CM/ECF  
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